OCT 2 7 2021

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

U. S. DISTRICT COURT EASTERN DISTRICT OF MO ST. LOUIS

| UNITED STATES OF AMERICA, |) |
|---------------------------|-------------------|
| Plaintiff, | |
| v. | 4:21CR578 SEP/SRW |
| CONNOR BRUEGGEMANN, | 7.21CK3/6 SEP/SRW |
| Defendant. |) |

INDICTMENT

COUNT I (Receipt)

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

- 1. Federal law defined the term
- (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. §2256(1));
 - (b) "sexually explicit conduct" to mean actual or simulated--
 - (i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,
 - (ii) bestiality,
 - (iii) masturbation,
 - (iv) sadistic or masochistic abuse, or
 - (v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. §2256(2)(A));

- (c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6));
- (d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--
 - (A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or
 - (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. §2256(8)).
- 2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.
- 3. Between on or about November 28, 2019 and on or about July 14, 2020, within the Eastern District of Missouri and elsewhere,

CONNOR BRUEGGEMANN,

the defendant herein, did knowingly receive child pornography using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer or tablet, to wit, defendant received via the internet, image files that contained child pornography, including, but not limited to, the following:

- "0aYGWcgY.jpg" a graphic image file that depicts a minor female engaged in oralgenital sexual intercourse with an adult male;
- 2) "0b887d08-cddb-4540-b699-b194c3130ffa"- a graphic image file that depicts a minor female in lascivious display of her genitals.

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2.

(Possession)

The Grand Jury further charges that:

- 4. The Grand Jury realleges the definitions set forth in paragraphs 1 through 2 of Count One.
- 5. Between on or about November 28, 2019 and on or about July 14, 2020, within the Eastern District of Missouri and elsewhere,

CONNOR BRUEGGEMANN,

the defendant herein, did knowingly possess material that contained an image of child pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, Samsung SM-G960U, said electronic device having being produced outside of Missouri and therefore having traveled in interstate and foreign commerce, and said electronic device contained child pornography, including by not limited to, the following:

- "gMthjRAb_1.jpg"- a graphic image file that depicts a minor female in lascivious display
 of her genitals and engaged in sadistic or masochistic abuse;
- 2) "7c1ExY4D.jpg"- a graphic image file that depicts a minor female engaged in analgenital sexual intercourse with an adult male;

3) "cREFCYbD_1.jpg" – a graphic image file that depicts a minor female in oral-genital sexual intercourse with a dog.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

DIANNA R. COLLINS, #59641MO Assistant United States Attorney

SAYLER A. FLEMING United States Attorney